

October 23, 2023

VIA ECF

The Honorable Eric Komitee
United States District Court for the Eastern District of New York
225 Cadman Plaza East, Courtroom: 6G North
Brooklyn, New York 11201

Re: *In re: Vale S.A. Securities Litigation*, No. 19 Civ. 526 (EK) (SJB)

Dear Judge Komitee:

I write respectfully on behalf of Defendants in the above-referenced matter to inform the Court of Defendants' intention to file a Motion for Class Decertification based on newly adduced expert evidence. Pursuant to Section III.C.2 of the Court's Individual Rules and Practices, the parties have negotiated a briefing schedule, and will file a complete set of all motion papers on November 17, 2023.

Respectfully submitted,

/s/ Christopher M. Joralemon

cc: All Counsel of Record (*via ECF*)